

EXHIBIT A

Declaration of Lucille Chiusano

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

ANTHONY SESSA AND MARK SESSA,
individually and on behalf of all others similarly
situated,

Plaintiffs,

vs.

ANCESTRY.COM OPERATIONS INC., a
Virginia Corporation; ANCESTRY.COM, INC.,
a Delaware Corporation; ANCESTRY.COM
LLC, a Delaware Limited Liability Company,

Defendants.

DECLARATION OF LUCILLE CHIUSANO

I, Lucille Chiusano, hereby declare as follows:

1. I am a staff member at the Law Offices of Miles N. Clark, LLC, which, along with
co-counsel, represents Plaintiffs in this matter. I am over the age of 18.

2. On March 1, 2023, at the direction of Plaintiffs' counsel, I performed a search on
the free limited access portion of the Ancestry.com website from my office in Las Vegas, Nevada.
The search requested all records in Ancestry's yearbook database from "Nevada, USA."

3. A true and correct screenshot of the search parameters, which was captured at the
time the parameters were entered, is reproduced in **Exhibit 1**, attached here.

4. In response to the search query, Ancestry delivered a list of search results that
appears to comprise all 2,687,194 searchable yearbook records in Ancestry's yearbook database
from schools in Nevada. A true and correct screenshot of the search results, which was captured

1 at the time Ancestry delivered the search results to me on my computer in Nevada, is reproduced
2 in **Exhibit 1**, attached here.

3 5. I performed a similar search for all fifty states. That is, I performed forty-nine
4 additional searches on the free limited access portion of the Ancestry.com website, each time
5 requesting all records in Ancestry's yearbook database from a given state.

6 6. In response to my search queries, Ancestry delivered a set of search results that,
7 taken together, appear to comprise all searchable yearbook records in Ancestry's database from
8 any school in the country.
9

10
11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct to the best of my knowledge.
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14 Executed this 2nd day of March, 2023 in Las Vegas, Nevada.
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17 Lucille Chiusano

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Exhibit 1

Search > Schools, Directories & Church Histories

U.S., School Yearbooks, 1900-2016

Search ☐ Match all terms exactly

First & Middle Name(s) Last Name

Year Location

Birth —

Lived In Nevada, USA

☒ Exact to this place

Any Event City, County, State, Country

Keyword

e.g. pilot or "Flying Tigers" ▾

Grade Completed

Photo Description

Year

Yearbook Date

Search **Clear search**

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Find out what your relatives were really like in high school and college with our newly-expanded Yearbooks collection. With more than 500,000 yearbooks and more than 80 million pages, it's a treasure trove of fascinating family details.

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[Learn more ▾](#)

Browse this collection

To browse this image set, select from the options below.

State

Choose... ▾

City

▾

School Name

▾

Year

All U.S., School Yearbooks, 1900-2016 Results

Your search



Results 1-20 of 2,687,194

Lived In: nevada, usa

Apply

▾ All Categories

> Schools, Directories & Church Histories

> School Lists & Yearbooks

U.S., School Yearbooks, 1900-2016

This database is a collection of middle school, junior high, high school, and college yearbooks from across the United States. While yearbooks may not provide information about the vital events...

[Learn more about this database...](#)[Browse Individual Records ▶](#)

View Record	Name	Yearbook Date	School	School Location	View Image
View Record	Christina Anderson	1900	University	Nevada, USA	
View Record	James Bell	1900	University	Nevada, USA	
View Record	Marie Billet	1900	University	Nevada, USA	
View Record	Dick Black	1900	University	Nevada, USA	
View Record	Lucille Bylund	1900	University	Nevada, USA	
View Record	Joe Capriola	1900	University	Nevada, USA	
View Record	Stephen Cornish	1900	University	Nevada, USA	
View Record	Mildred Cook	1900	University	Nevada, USA	
View Record	Lenore Crittenden	1900	University	Nevada, USA	
View Record	Billy Drown	1900	University	Nevada, USA	
View Record	Ida Florence Drown	1900	University	Nevada, USA	
View Record	Glenn Fox	1900	University	Nevada, USA	
View Record	Lucille Franklin	1900	University	Nevada, USA	
View Record	Ella Mae Goodale	1900	University	Nevada, USA	
View Record	Laura Garcia	1900	University	Nevada, USA	
View Record	William Gaul	1900	University	Nevada, USA	
View Record	Alex Hay	1900	University	Nevada, USA	
View Record	Shirley Hines	1900	University	Nevada, USA	
View Record	Edna Hoag	1900	University	Nevada, USA	
View Record	Mabel Johnson	1900	University	Nevada, USA	

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